

EXHIBIT 4

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Attorneys for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

LINDSEY LABELLA, MICHAEL PAWSON,
 STACEY RODGERS, on behalf of themselves
 and all others similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

CLASS ACTION

**PLAINTIFF'S CONSUMER LEGAL
 REMEDIES ACT VENUE DECLARATION**

I, Lindsey LaBella, declare as follows:

1. I am a named plaintiff in this litigation.

2. I have personal knowledge of the matters set forth below except to those matters stated herein, which are based on information and belief, which matters I believe to be true.

3. If called as a witness, I could and would competently testify to the matters included herein.

4. Based on Apple's misrepresentations and omissions, I purchased Apple AirPods Pro Gen 1 headphones.

5. I am informed and believe that venue is proper in this Court under Cal. Civ. Code Section 1780(d) based on the fact that Apple is incorporated under the laws of the State of California; its corporate headquarters and principal place of business are located in Cupertino (Santa Clara County), California; it conducts substantial business in this District; and a substantial part of the acts and omissions complained of occurred in this District.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this ²² day of October, 2024, in Pittsburgh, PA.

Signed by:

Lindsey LaBella

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Lindsey LaBella

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 and all others similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

CLASS ACTION

**PLAINTIFF'S CONSUMER LEGAL
 REMEDIES ACT VENUE DECLARATION**

I, Michael Pawson, declare as follows:

1. I am a named plaintiff in this litigation.

2. I have personal knowledge of the matters set forth below except to those matters stated herein, which are based on information and belief, which matters I believe to be true.

3. If called as a witness, I could and would competently testify to the matters included herein.

4. Based on Apple's misrepresentations and omissions, I purchased Apple AirPods Pro Gen 1 headphones.

5. I am informed and believe that venue is proper in this Court under Cal. Civ. Code Section 1780(d) based on the fact that Apple is incorporated under the laws of the State of California; its corporate headquarters and principal place of business are located in Cupertino (Santa Clara County), California; it conducts substantial business in this District; and a substantial part of the acts and omissions complained of occurred in this District.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this ²² day of October, 2024, in Humble, Texas.

Signed by:

 945056AF6C3A452...

Michael Pawson

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

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 STACEY RODGERS, on behalf of themselves
 and all others similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

CLASS ACTION

**PLAINTIFF'S CONSUMER LEGAL
 REMEDIES ACT VENUE DECLARATION**

I, Stacey Rodgers, declare as follows:

1. I am a named plaintiff in this litigation.

2. I have personal knowledge of the matters set forth below except to those matters stated herein, which are based on information and belief, which matters I believe to be true.

3. If called as a witness, I could and would competently testify to the matters included herein.

4. Based on Apple's misrepresentations and omissions, I purchased Apple AirPods Pro Gen 1 headphones.

5. I am informed and believe that venue is proper in this Court under Cal. Civ. Code Section 1780(d) based on the fact that Apple is incorporated under the laws of the State of California; its corporate headquarters and principal place of business are located in Cupertino (Santa Clara County), California; it conducts substantial business in this District; and a substantial part of the acts and omissions complained of occurred in this District.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 10/29/24 day of October, 2024, in Painesville, Ohio.

Signed by:

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Stacey Rodgers